

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
CASE NO. 25-cr-117 (ECT/SGE)

UNITED STATES OF AMERICA,

Plaintiff,

v.

**MOTION FOR AN EXTENSION
OF TIME TO FILE MOTIONS**

JUSTIN DAVID EICHORN,

Defendant.

Mr. Eichorn, by and through his undersigned counsel, respectfully requests the Court extend the deadlines to file motions (as well as the other corresponding future deadlines). Motions are currently due by April 23, 2025, and Mr. Eichorn requests this deadline be continued to **May 16, 2025**. Mr. Eichorn also requests the corresponding future deadlines likewise be continued.

Undersigned counsel Waldon conferred with counsel for the government, who represented the government does not object to this request.

This extension is appropriate because counsel needs additional time to review the discovery with Mr. Eichorn, conduct investigation, draft motions, and confer with Mr. Eichorn and counsel for the government. Additionally, Mr. Eichorn's pre-trial conditions of release requiring him to reside at a halfway house in Duluth creates time constraints relating to counsel's review of discovery with Mr. Eichorn. For the above reasons, denial

of this extension request would deprive undersigned counsel of the time necessary to properly evaluate and prepare pretrial motions.

Based on all the files and records in the case, it is therefore respectfully requested that this Court extend the motions date and corresponding deadlines as requested above.

Dated: April 18, 2025

Respectfully submitted,

/s/ Charles L. Hawkins

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